

1 JOSEPH P. RUSSONIELLO (CABN 44332)
United States Attorney

3 BRIAN J. STRETCH (CABN 163973)
Chief, Criminal Division

5 TAREK J. HELOU (CABN 218225)
Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055
7 San Francisco, California 94102
8 Telephone: (415) 436-7071
Facsimile: (415) 436-7234
9 Tarek.J.Helou@usdoj.gov

10 Attorneys for Plaintiff

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15
16 UNITED STATES OF AMERICA,) CR No. 07-711 MMC
17 Plaintiff,)
18 v.) STIPULATION AND [PROPOSED]
19 OSCAR E. ROMERO-ROMERO, JR.,) PROTECTIVE ORDER UNDER FED. R.
20 Defendant.) CRIM. P. 16
21 _____)

22 On May 21, 2008, the parties in this case appeared before the Court and addressed the
23 need for the following protective order. After that hearing, at which both parties were heard, the
24 Court issues the following Protective Order, to which both parties have stipulated.

25 **PROTECTED MATERIAL**

26 The government has provided defense counsel with documents from A-Files related to
27 individuals other than the defendant. Those documents are bates-labeled USA-000419 through
28 USA-000851, and are the "Protected Material." Pending the issuance of this Order, defense

1 counsel agreed to guard the confidentiality of those documents by complying with the terms of a
2 letter sent by government counsel on May 19, 2008.

3 **PROTECTIVE ORDER**

4 Pursuant to Federal Rule of Criminal Procedure 16, good cause exists for entry of a
5 protective order for the above-described documents and disclosure of these materials shall be
6 subject to the following restrictions:

7 **1. Protected Material**

8 Possession of copies of the Protected Material is limited to: (1) attorneys for defendant
9 Oscar E. Romero-Romero, Jr., specifically Jodi Linker and other attorneys at the Northern
10 District of California Office of the Federal Public Defender; and (2) their respective
11 investigators, experts, and paralegals. Those people are collectively referred to as the "Defense
12 Team."

13 The Defense Team shall not provide copies of the Protected Material to any other person
14 except the defendant, and only in conjunction with their defense of him in this case. At no time
15 will any copies of the Protected Material be left in the custody of any person other than the
16 defendant. The Defense Team is prohibited from using the Protected Material for any purpose
17 other than defending the defendant in this case. The defendant must return all copies of
18 Protected Material to the Defense Team after the termination of this case.

19 The Defense Team may show copies of the Protected Material to witnesses or potential
20 witnesses, but only in conjunction with their defense of the defendant in this case.

21 Further, the defendant's attorneys shall provide the defendant and all members of the
22 Defense Team with a copy of this Order.

23 This Order shall be binding on all subsequent attorneys who represent the defendant in
24 this case and on any other person who becomes a member of the Defense Team or comes into
25 possession of Protected Material.

26 If Protected Material is used in court filings, it shall be filed under seal, and no further
27 order from the Court is required to file such documents under seal.

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1 **2. Non-termination**

2 The provisions of this Order shall not terminate at the conclusion of this prosecution but
3 only upon further order of this Court.

4

5

6 SO STIPULATED:

7 JOSEPH P. RUSSONIELLO
8 United States Attorney

9

10 DATED: June 10, 2008

/s/

11 TAREK J. HELOU
12 Assistant United States Attorney

13 DATED: June 10, 2008

/s/

14 JODI LINKER
15 Attorney for Defendant Oscar Romero-Romero, Jr.

16

17 SO ORDERED.

18

19 DATED:_____

20 THE HONORABLE MAXINE M. CHESNEY
21 United States District Judge